

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

IN RE: NATIONAL HOCKEY LEAGUE )  
PLAYERS CONCUSSION INJURY )  
LITIGATION )  
\_\_\_\_\_ )

MDL No. 14-2551 (SRN/JSM)

This Document Relates to: )  
ALL ACTIONS )

**DECLARATION OF WILLEM MEEUWISSE IN SUPPORT OF NON-PARTY U.S. NHL  
CLUBS' OPPOSITION TO PLAINTIFFS' MOTION TO ENFORCE SUBPOENAS**

I, Willem Meeuwisse, M.D., Ph.D. declare as follows:

1. I am a medical doctor in sports medicine and also have a Ph.D in epidemiology. I am the President of Meeuwisse Consulting Services Inc., and I have been a consultant for the National Hockey League since 2001.

2. As part of my duties as a medical consultant to the National Hockey League, I am familiar with and oversee the Athlete Health Management System ("AHMS"). The AHMS is a League-wide electronic database that contains medical information on the National Hockey League ("NHL") players that are utilized by the thirty NHL teams. This Declaration is based upon knowledge I gained in the performance of my duties overseeing the AHMS and my review of AHMS de-identified data maintained in the ordinary course of business.

3. The NHL teams began using the AHMS in 2006 and have used it continuously until the present.

4. The AHMS contains all relevant medical documents that are in the Clubs' possession from Club medical staff, including, for example:

- a. Athletic trainer notes and treatment notes;
- b. Team doctor medical notes;

- c. Diagnostic medical records, such as blood work and laboratory results, and investigation reports, including, for example, EKG, x-ray, MRI, CT scans, and other diagnostic test reports;
- d. Specialist medical records, such as evaluations from orthopedic doctors, surgical medical records, dental records, eye exam medical records, and neuropsychologist reports; and
- e. Annual pre-season physical and annual exit examination.

5. As a result, the AHMS includes a voluminous amount of records that are either typed directly into the AHMS or are scanned as attachments into the AHMS.

6. Currently, there are the following components in the AHMS:

- a. 509,408 medical notes;
- b. 178,570 medical record attachments, many of which are multi-paged; and
- c. 20,110 annual pre-season physical examination forms. Because each form is approximately 18 pages long, there are 361,980 pages of preseason physical forms.

7. The AHMS is designed with strict security measures to protect the personal and confidential medical information of NHL players. Because the underlying medical information is confidential, I am unable to access the medical documents to determine the number of pages of each medical record.

8. Even if I conservatively assumed that each of the 509,408 medical notes and each 178,570 medical record attachments is only a 1 page document, there would be at least 1,049,958 pages of medical notes and documents in the AHMS.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this  
17th day of May, 2015, at Calgary, Alberta.



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Willem Meeuwisse, M.D., Ph.D